

THE LAW OFFICES OF SEAN M. MAHER, PLLC

MEMO ENDORSED

December 21, 2023

VIA ECF

Hon. Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Chellel et al.* (Indigo Grant), 21 Cr. 441 (KMK)
Travel request for Defendant Indigo Grant

Dear Judge Karas:

On behalf of defendant Indigo Grant, I write to request permission for Ms. Grant to travel from Atlanta to Savannah, Georgia from December 23, 2023, through December 26, 2023, to visit and stay with her mother for Christmas.

Ms. Grant is on pretrial release on conditions including location monitoring. She lives in Atlanta and has been directly supervised by Pretrial Services Officer Ben Heath from the Northern District of Georgia. Ms. Grant would like to visit and stay with her mother in Savannah for Christmas. Besides wanting to be with her mother for this important holiday, Ms. Grant also wants to be with her mother because her mother is about to start chemotherapy. A copy of Mr. Grant's mother's upcoming oncology treatment calendar is attached as Exhibit A, with a request for sealing as the document is a medical record. The defense proposes that Ms. Grant leave Atlanta by car on the morning of December 23, 2023 and return by car during the evening of December 26, 2023. Ms. Grant's mother's address has been provided to the government.

I have communicated this request to the government and have been informed by AUSA Nicholas Bradley that the government has no objection to Mr. Grant's travel request. I also have emailed with PTS Officer Ben Heath, who has no objection to this request. I emailed PTS Officer Leo Barrios here in our district and then emailed the Pretrial Services Office when I learned that PTS Off. Barrios is out of the office during the holidays. PTS Officer John Lettieri, who responded on behalf of the Pretrial Services Office, informed me via email that Pretrial Services opposes the request, stating that "[o]ur office generally objects to requests for overnight travel for defendants subject to location monitoring, especially for social purposes." AUSA Bradley subsequently emailed me that he spoke with PTS Off. Barrios, who in our district normally supervises Ms. Grant, and that PTS Off. Barrios does not oppose the request.

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The Court's consideration is greatly appreciated.

Respectfully submitted,

/S/
Sean M. Maher
Counsel for Indigo Grant

cc: All counsel via ECF

Granted.

So Ordered.


12/21/23